

**EXHIBIT O**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**Drew J. Ribar,**  
Plaintiff,

v.

**State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,**  
Defendants.

**Case No. 3:24-cv-00103-ART-CLB**

**EXHIBIT O – Ten-Year Log of Deleted, Hidden, and Edited Social Media  
Comments**

**(Bates No. EX033)**

**Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P.  
56)**

Plaintiff Drew J. Ribar, pro se, submits Exhibit O, email string requesting public records request from Carson City, reflecting approximately ten years of deleted, hidden, or edited comments on official government social media pages. This includes activity by the Carson City Sheriff's Office (CCSO), Public Works, and other municipal entities. Filed electronically per LR IC 2-2 with a Notice of Manual Filing, this exhibit stands alone as evidence of systemic censorship and content suppression by Defendants and is cross-referenced with Exhibits C, D, E, F, J, K, L, and M in support of Plaintiff's Rule 56 motion.

PLEADING TITLE - 1

## Key Evidence and Legal Violations:

Section	Incident	Legal Relevance	Cross-Reference
		First Amendment retaliation —	
		systematic suppression of	
		protected speech over time	Exhibit C (video);
	Ten-year record of	violates clearly established	Exhibit E (threats);
	deleted/hidden/edited social	rights ( <i>O'Connor-Ratcliff v.</i>	Exhibit J
Comment	media comments by Carson	<i>Garnier</i> , 144 S. Ct. 717 (2024); (complaint);	
Deletion	City government accounts.	<i>Knight; Packingham</i> ;	Exhibit K
Log	Includes criticism of arrests,	<i>Davison</i> ); Monell liability	(dismissal);
(EX033)	misconduct allegations, links to	( <i>Monell v. Dep't of Soc. Servs.</i> , Exhibit L (recent	
	videos (e.g., Exhibit C), and	436 U.S. 658 (1978));	deletions); Exhibit
	political speech by Plaintiff and	viewpoint discrimination;	M (pre-deletion
	others.	damage to Audit Reno and	notice)
		A&A Towing ( <i>Umbehr</i> ,	
		<i>Meyer</i> ).	

## Legal Claims Supported:

- **First Amendment (42 U.S.C. § 1983):** Decade-long pattern of content deletion and blocking demonstrates censorship of public criticism in violation of clearly established law.

- 1 • **Monell Liability:** Establishes a longstanding policy, practice, or custom of digital  
2 suppression traceable to Carson City entities.
- 3 • **Fourteenth Amendment (Due Process/Substantive Harm):** Viewpoint-based deletion  
4 without notice or appeal.
- 5 • **State Law Claim (NRS 197.200):** Oppression under color of law.
- 6 • **Economic Harm to A&A Towing:** Suppression of outreach affects public visibility,  
7 marketing, and goodwill (*Meyer v. Nebraska*, 262 U.S. 390 (1923)).  
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#### 10 **Summary Judgment Purpose (Fed. R. Civ. P. 56):**

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12 Exhibit O's ten-year deletion log (EX033) shows that Defendants engaged in long-term  
13 censorship and digital retaliation against Plaintiff and similarly situated individuals. When  
14 combined with Exhibits C, D, E, F, J, K, L, and M, these undisputed facts form a cohesive  
15 narrative of retaliatory conduct violating Plaintiff's constitutional rights. No reasonable jury  
16 could find that Defendants' actions were justified or accidental, entitling Plaintiff to summary  
17 judgment as a matter of law.  
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#### 22 **Authentication:**

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24 Per Fed. R. Evid. 901, Plaintiff will provide a sworn declaration authenticating the spreadsheet as  
25 received from a verified public records request to Carson City, with unaltered metadata,  
26 confirming its reliability as a public record.  
27  
28

**Dated:** March 27, 2025

**/s/ Drew J. Ribar**

Drew J. Ribar

3480 Pershing Ln, Washoe Valley, NV 89704

Tel: (775) 223-7899 | Email: Const2Audit@gmail.com

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**Drew J. Ribar,**  
Plaintiff,

v.

**State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,**  
Defendants.

**Case No. 3:24-cv-00103-ART-CLB**

**AFFIDAVIT OF DREW J. RIBAR IN SUPPORT OF EXHIBIT O**

(Public Records Request and Government Response – Social Media Deletion Data)

I, **Drew J. Ribar**, being of sound mind and over the age of 18, hereby declare under penalty of perjury as follows:

**1. Personal Background:**

I am the Plaintiff in the above-captioned matter and the author of the attached email correspondence marked **Exhibit O**.

PLEADING TITLE - 4

1       **2. Public Records Request:**

2           On or about **January 21, 2024**, I submitted a formal public records request to Carson  
3           City officials—including the District Attorney’s Office—seeking access to records  
4           documenting **any deleted, hidden, or edited comments** on official Carson City and  
5           Carson City Sheriff’s Office (CCSO) social media platforms over the past several years.

6       **3. Government Response:**

7           On **February 6, 2024**, I received an official response from **Deputy District Attorney**  
8           **Adam Tully** via email. This email contained an attachment labeled “**10 Years -**  
9           **Comments deleted, hidden, edited.xlsx**”, which listed **11,653 instances** of content  
10          moderation (including deletions) performed on Carson City-operated social media pages,  
11          dating from **2014 to 2024**.

12       **4. Authentication of Exhibit O and Exhibit N:**

- 13           a. The email exchange attached as **Exhibit O** is a **true and correct copy** of my  
14           correspondence with Carson City in connection with my request.  
15           b. The spreadsheet produced in response, now submitted as **Exhibit N**, is an **unaltered**  
16           **electronic file** that was downloaded directly from the link provided in the City's official  
17           response.  
18           c. I have personal knowledge of submitting the request, receiving the government’s reply,  
19           and reviewing the records they provided.

20       **5. Use in Litigation:**

21           I submit this affidavit to authenticate Exhibits N and O under **Federal Rule of Evidence**  
22           **901** and to support my amended complaint and summary judgment motion under **Federal**  
23           **Rule of Civil Procedure 56(c)(4)**.

1       **6. Truthfulness:**

2           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
3           knowledge, information, and belief.  
4

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6  
7       **Executed on:** March 28, 2025

8       **Location:** Washoe Valley, Nevada  
9

10      **/s/ Drew J. Ribar**

11      **Drew J. Ribar**

12      3480 Pershing Ln

13      Washoe Valley, NV 89704  
14

15      Phone: (775) 223-7899

16      Email: Const2Audit@gmail.com  
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3/28/25, 11:02 AM

Gmail - Record Request Social Media Deletions



Const2Audit <const2audit@gmail.com>

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## Record Request Social Media Deletions

6 messages

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**Const2Audit** <const2audit@gmail.com>  
To: recordrequests@carson.org

Mon, Jan 22, 2024 at 11:20 AM

Greetings,

Please provide a records of all individual blocked on social media accounts operated by Carson City especially the Sheriff's Office over the last 10 years. Provide a record of every comment ever deleted from Carson City social media account. Provide the name of the employee responsible for deleting and blocking. Provide any memo policy or any other record dealing with social media.

Respectfully,

Drew Ribar  
Auditing Reno 911  
775-223-7899

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**Adam Tully** <ATully@carson.org>  
To: "const2audit@gmail.com" <const2audit@gmail.com>  
Cc: Record Requests <RecordRequests@carson.org>

Mon, Jan 29, 2024 at 4:17 PM

Hello Mr. Ribar,

In response to your January 22, 2024, request for public records, attached please find Carson City's Social Media Policy.

As to your request for records concerning individuals blocked and comments deleted over a ten year period, the City requires additional time to compile and review potentially responsive documents. Pursuant to NRS 239.0107(1)(c), the earliest date and time by which the City reasonably believes any responsive records will be available for disclosure is 5:30pm on Friday, February 9, 2024. I'll check in with you again on or before that date and time.

Best,

Adam Tully, Esq.

Deputy District Attorney

Carson City District Attorney's Office

885 E. Musser St., Ste. 2030

Carson City, NV 89701

(775) 887-2070

3/28/25, 11:02 AM

Gmail - Record Request Social Media Deletions

atully@carson.org

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**From:** Const2Audit <const2audit@gmail.com>  
**Sent:** Monday, January 22, 2024 11:20 AM  
**To:** Record Requests <RecordRequests@carson.org>  
**Subject:** Record Request Social Media Deletions

**This message originated outside of Carson City's email system. Use caution if this message contains attachments, links, or requests for information.**

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[Quoted text hidden]

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 **City Social Media Policy.pdf**  
808K

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**Adam Tully** <ATully@carson.org>  
To: "const2audit@gmail.com" <const2audit@gmail.com>  
Cc: Record Requests <RecordRequests@carson.org>

Thu, Feb 8, 2024 at 4:38 PM

Hello Mr. Ribar,

Attached you will find the 10-year history of comments deleted, hidden, or edited on the City's social media pages. As to records concerning individuals blocked, the City requires additional time to compile and review potentially responsive documents. Pursuant to NRS 239.0107(1)(c), 5:30pm on Wednesday, February 14, 2024 is the earliest date and time by which the City reasonably believes responsive records concerning individuals blocked will be available. I'll check in with you again on or before that date and time.

Best,

Adam Tully, Esq.

Deputy District Attorney

Carson City District Attorney's Office

885 E. Musser St., Ste. 2030

Carson City, NV 89701

775-283-7457

atully@carson.org



3/28/25, 11:02 AM

Gmail - Record Request Social Media Deletions

[Quoted text hidden]

**10 Years - Commentes deleted, hidden, edited.xlsx**  
1307K**Const2Audit** <const2audit@gmail.com>

Thu, Feb 8, 2024 at 7:42 PM

To: Adam Tully &lt;ATully@carson.org&gt;

Cc: rich@mlreno.com

I appreciate your response.

11,653 instances of public comment deleted by the government on social media... May I suggest you look at the 9th Circuit Ruling in Garnier v Oconner-Ratcliff and listen to the Supremes questions regarding public officials social media pages...

YouTube link to Supreme Court oral arguments [https://youtu.be/wmFgf1Jm1-k?si=v\\_4KNDmeBadP8LFI](https://youtu.be/wmFgf1Jm1-k?si=v_4KNDmeBadP8LFI)

Similar actions by Woodland Colorado a Judge ordered the city to pay \$65,000.00  
<https://youtu.be/0knmUaSJltc?si=kwfTcs02sT07gEoz>

Multiply \$65k x 11,653 = \$757,445,000

Please evaluate Carson City and its 1st Amendment compliance.

Respectfully,

Drew

[Quoted text hidden]

**Adam Tully** <ATully@carson.org>

Wed, Feb 14, 2024 at 3:35 PM

To: Const2Audit &lt;const2audit@gmail.com&gt;

Hello Mr. Ribar,

Regarding your request for records concerning individuals blocked over the last 10 years, apologies, but the City still requires additional time to compile and review potentially responsive documents. As I understand it, the report for this data is not generating properly and we're working on resolving that technical issue. Pursuant to NRS 239.0107(1)(c), 5:30pm on Wednesday, February 21, 2024 is the earliest date and time by which the City reasonably believes responsive records concerning individuals blocked will be available. I'll check in with you again on or before that date and time.

[Quoted text hidden]

**Adam Tully** <ATully@carson.org>

Wed, Feb 21, 2024 at 9:15 AM

To: Const2Audit &lt;const2audit@gmail.com&gt;

Hello Mr. Ribar,

See the attached reports concerning individuals blocked over the last 10 years. I believe the City has provided all existing documents responsive to your request, so I'll be closing this record request at this time.

Best,

3/28/25, 11:02 AM

Gmail - Record Request Social Media Deletions

Adam Tully, Esq.

Deputy District Attorney

Carson City District Attorney's Office

885 E. Musser St., Ste. 2030

Carson City, NV 89701

775-887-2070

[Quoted text hidden]

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**10 attachments**



**CC MotorUnit.csv**

1K



**CC Parks.csv**

1K



**CC Senior Center.csv**

3K



**CC Sheriffs.csv**

6K



**CCPW.csv**

1K



**Safe Routes to School.csv**

1K



**CC Gov Twitter.csv**

1K



**CC Gov.csv**

3K



**CC Health.csv**

1K



**CC K9Unit.csv**

1K